

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS, JUSTIN DIOR COMBS, ETHIOPIA HABTEMARIAM, LUCIAN CHARLES GRAINGE, KRISTINA KHORRAM, CHALICE RECORDING STUDIOS, LOVE RECORDS, MOTOWN RECORDS, UNIVERSAL MUSIC GROUP, COMBS GLOBAL ENTERPRISES, JOHN and JANE DOES 1-10 and ABC CORPORATIONS. 1-10,

*Defendants.*

Case No.: 24-cv-01457

**NOTICE OF MOTION TO  
DISMISS THE FIRST  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in support of this Notice of Motion, the supporting Declaration of Donald S. Zakarin dated March 26, 2024, and the Declarations of Sir Lucian Grainge dated March 25, 2024, Martha Braithwaite dated March 25, 2024, and Ethiopia Habtemariam dated March 27, 2024 exhibited thereto and their respective exhibits, and all prior proceedings heretofore had and all papers filed herein, Defendants Sir Lucian Grainge, Motown Records and UMG Recordings, Inc., (the “UMG Defendants”) will move this Court, at a date and time to be determined by the Court, for Orders dismissing with prejudice all claims against them in plaintiff Rodney Jones’ (“Plaintiff”) Amended Complaint dated March 4, 2024, pursuant to Federal Rules of Civil Procedure 8, 12(b)(2) and 12(b)(6) and to strike impertinent and scandalous allegations in the Amended Complaint pursuant to Rule 12(f).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and memoranda shall be served within 14 days hereof, and any reply papers shall be served within 7 days after service of the answering papers.

Dated: New York, New York  
March 27, 2024

**PRYOR CASHMAN LLP**

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